

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                               |                       |
|-----------------------------------------------|-----------------------|
| <b>BRIAN MILLER; HECTOR CALDERON;</b>         | :                     |
| <b>CHARLES FOLWELL; ROLLAND GREEN;</b>        | :                     |
| <b>DAWN M. HAUCK; KEVIN KEIR;</b>             | :                     |
| <b>ASHBY LINCOLN; KAREN MASINO;</b>           | :                     |
| <b>ROBERT W. PETERSON; SUSAN M. POKOISKI;</b> | :                     |
| <b>DAN P. ROLLINS; and WILLIAM SPERATI,</b>   | : C.A. No. 05-010-JJF |
|                                               | :                     |
| <b>Plaintiffs,</b>                            | :                     |
|                                               | :                     |
| <b>v.</b>                                     | :                     |
|                                               | :                     |
| <b>COMPUTER SCIENCES CORPORATION,</b>         | :                     |
| <b>a Delaware Corporation,</b>                | :                     |
|                                               | :                     |
| <b>Defendant.</b>                             | :                     |

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**APPENDIX TO PLAINTIFF'S ANSWERING BRIEF IN OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

**2 of 3**

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Dated: June 8, 2006

Timothy J. Wilson, Esquire (DE #4323)  
MARGOLIS EDELSTEIN  
1509 Gilpin Avenue  
Wilmington, DE 19806  
(302) 777-4680  
Attorney for Plaintiffs

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BRIAN MILLER, HECTOR CALDERON, )  
CHARLES FOLWELL, DAWN M. )  
HAUCK, KEVIN KEIR, ASHBY )  
LINCOLN, KAREN MASINO, ROBERT )  
W. PETERSON, SUSAN M. POKOISKI, )  
DAN P. ROLLINS, and WILLIAM )  
SPERATI, )

Plaintiffs, )

v. )

C.A. No. 05-10-JJF

COMPUTER SCIENCES CORPORATION, )

Defendant. )

Deposition of SUSAN M. POKOISKI taken pursuant to notice at the law offices of Potter Anderson & Corroon, Hercules Plaza, 6th Floor, Wilmington, Delaware, beginning at 9:00 a.m., on Thursday, February 16, 2006, before Kimberly A. Hurley, Registered Merit Reporter and Notary Public.

APPEARANCES:

TIMOTHY J. WILSON, ESQUIRE  
MARGOLIS EDELSTEIN  
1509 Gilpin Avenue  
Wilmington, Delaware 19806  
for the Plaintiffs

LARRY R. SEEGULL, ESQUIRE  
LINDA M. BOYD, ESQUIRE  
DLA PIPER RUDNICK GRAY CARY US LLP  
6225 Smith Avenue  
Baltimore, Maryland 21209-3600  
for the Defendant

WILCOX & FETZER  
1330 King Street - Wilmington, Delaware 19801  
(302) 655-0477



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B-0368

1 APPEARANCES (cont'd):

2 TYLER B. RAIMO, ESQUIRE  
3 COMPUTER SCIENCES CORPORATION  
4 3170 Fairview Park Drive  
5 Falls Church, Virginia 22042  
6 for the Defendant

7 - - - - -

8 SUSAN M. POKOISKI,  
9 the witness herein, having first been  
10 duly sworn on oath, was examined and  
11 testified as follows:

12 BY MS. BOYD:

13 Q. As I said to you before we went on the record,  
14 my name is Linda Boyd. With me today is Larry Seegull  
15 and Tyler Raimo, both attorneys representing Computer  
16 Sciences Corporation.

17 I'm going to refer to Computer Sciences  
18 Corporation as CSC throughout this deposition. Will you  
19 understand what I'm referring to?

20 A. Yes.

21 Q. Could you please state your full name for the  
22 record?

23 A. Susan M. Pokoiski.

24 Q. The purpose of this deposition is to inquire  
about allegations forming the basis of your lawsuit. I'm



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1 going to ask you some questions to find out what you know  
2 about facts giving rise to the claims. I'd like to go  
3 through some instructions with you.

4 Have you ever been deposed before?

5 A. No, I haven't.

6 Q. We will need all of your answers to be verbal,  
7 since the court reporter can't take down head nods or  
8 other body language or uh-huh or uh-uh.

9 You must answer the questions truthfully  
10 and completely. You must provide testimony today just as  
11 if you were testifying in court.

12 If you don't hear a question, just say so  
13 and I'll repeat it. If you don't understand a question,  
14 just say so and I'll rephrase it. If you realize that an  
15 earlier answer that you gave was inaccurate or  
16 incomplete, just let me know, and if you want to correct  
17 or supplement your earlier answer, you will be allowed to  
18 do so.

19 If you want to stop to use the restroom or  
20 take a break or stretch, just let us know and we will  
21 take a short break.

22 If you don't know or remember the  
23 information necessary to answer a question, just say so.

24 You can't talk to your attorney during the



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1 deposition or discuss your testimony until the deposition  
2 is concluded, and you can't seek advice from your  
3 attorney during the deposition unless it relates to a  
4 question of privilege.

5 If you answer a question, I'll assume that  
6 you have heard it and understood it and have given me  
7 your best recollection.

8 Do you understand the instructions that I  
9 have given you?

10 A. Yes.

11 Q. Are you taking any medication that could  
12 possibly impair your ability to understand or answer  
13 these questions?

14 A. No.

15 Q. What did you do to prepare for this deposition?

16 A. Actually I got a letter to attend and that's  
17 basically it. I asked Tim what a deposition was, what to  
18 expect.

19 Q. When you say "Tim," you're referring to your  
20 attorney, Mr. Tim Wilson?

21 A. That's correct.

22 Q. Did you meet with Mr. Wilson prior to this?

23 A. Briefly. I spoke with Mia. I also called  
24 there for directions and things like that, but I did meet



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1 with Tim.

2 Q. You spoke to Mia Murphy, Tim Wilson's  
3 paralegal?

4 A. Right.

5 Q. When did you speak to her?

6 A. I guess when I got the letter, I guess what the  
7 expectation is and where the building was, directions.  
8 Actually I thought it was close to the Federal Building,  
9 so I'm glad I called. I'd have been sitting down there.

10 Q. When did you speak to Mr. Wilson?

11 A. Obviously I have spoken to him today.  
12 Yesterday. I spoke to him yesterday, also.

13 Q. Did you review any documents to prepare for  
14 this deposition?

15 A. Yes. I guess we went through some of the  
16 information that I forwarded to Tim.

17 Q. What information was that?

18 A. Anything I had on file or anything that I  
19 had -- which wasn't much, but anything that I had from  
20 2003, 2004.

21 Q. Have all those documents been produced to --

22 A. Everything that I had was given to Mia and Tim.

23 Q. Have they been produced to CSC?

24 A. I assume so. I don't know. Whatever I had I



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1 sent to Tim, to the law firm.

2 Q. Other than your attorney and Ms. Murphy, have  
3 you spoken to anyone else about the testimony you will  
4 give at this deposition?

5 A. No.

6 Q. Have you spoken to any of the other plaintiffs?

7 A. No. Well, I saw the plaintiffs on  
8 January 27th. That's the last time I saw them.

9 Q. At the mediation?

10 A. Right.

11 Q. Did you speak to them about your deposition  
12 testimony at that point?

13 A. No, I did not.

14 Q. Did you speak to them about any of their  
15 deposition testimony?

16 A. No, I did not.

17 Q. Have you ever been known by any other name?

18 A. Sue.

19 Q. Any other last name?

20 A. No.

21 Q. What's your Social Security number?

22 A. 222-42-8907.

23 Q. Where were you born?

24 A. In Wilmington.



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1 Q. In Wilmington, Delaware?

2 A. Yes.

3 Q. When was that?

4 A. May 22nd, 1955.

5 Q. Where do you live currently?

6 A. Smyrna, Delaware.

7 Q. What's your phone number?

8 A. 302-653-7948.

9 Q. Does anyone live at your present address with  
10 you?

11 A. My husband and my two children.

12 Q. How long have you lived there?

13 A. Since '79, November of '79.

14 Q. How long have you been married?

15 A. Since September 27th, 1975.

16 Q. You said you had two children. How old are  
17 they?

18 A. My daughter Stephanie is 19, will be 20 in  
19 April. And my son Kurt is 16, going to be 17 in May.

20 Q. Have you ever been arrested?

21 A. No, I haven't.

22 Q. Any conviction for a felony or misdemeanor?

23 A. No, none.

24 Q. Have you ever served in the military?



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1 A. No.

2 Q. When did you first contact an attorney to  
3 handle this case against CSC?

4 A. I did not contact an attorney. Well, I take  
5 that back. I received a letter in the mail indicating  
6 that I may be -- I wouldn't say may be. That the AMIP  
7 that we used to get might be -- I don't know how I'm  
8 going to phrase this.

9 I received a letter in the mail indicating  
10 that there was -- Jeff Martin was available to discuss or  
11 look at documents or information that you have around  
12 your AMIP that you usually got. So that's how I was  
13 contacted. And basically I called Jeff Martin and gave  
14 him my name.

15 Q. Was the letter from Jeff Martin?

16 A. No, it wasn't.

17 Q. Do you know who the letter was from?

18 A. No. There was no name on there.

19 Q. I'm showing you what's been premarked as  
20 Exhibit 4. Do you recognize that letter?

21 A. Yes, I do. This is it.

22 Q. You think that is the letter you received?

23 A. Yes, I think it is.

24 Q. This is the letter that caused you to



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1 contact --

2 A. Yes. Jeff Martin.

3 Q. Were you involved at all in the distribution of  
4 this letter?

5 A. No, I was not.

6 Q. Did you give it to anyone else who you thought  
7 might be interested?

8 A. No, I did not.

9 Q. What is the fee relationship you have with your  
10 present attorney?

11 A. My relationship?

12 Q. Your fee relationship. How are you paying him?

13 A. Actually I believe that we are liable for costs  
14 and things like that if we aren't successful or we don't  
15 have a good case. I really didn't get in.

16 Q. You don't know the details of the agreement?

17 A. I don't know the details.

18 Q. Is there a written agreement?

19 A. Not to my knowledge. I don't remember.

20 MS. BOYD: The same agreement?

21 THE WITNESS: I don't remember anything  
22 like that.

23 Q. Have any lawsuits ever been filed against you?

24 A. No.



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1 Q. Have you ever filed any other lawsuits?

2 A. There was an overtime civil lawsuit that was  
3 settled in the July or August time frame with CSC, and  
4 that's the only one that I have --

5 Q. You personally filed that lawsuit against CSC?  
6 What was the nature of the lawsuit?

7 A. Overtime, not paid for overtime. Not over a  
8 time period, but overtime that -- and actually I don't  
9 know how many people were there. I think it was a  
10 \$24 million lawsuit.

11 Q. Did you receive any money as a result?

12 A. Yes.

13 Q. How much did you receive?

14 A. \$250. Nothing substantial.

15 Q. Have you ever been a witness in a lawsuit?

16 A. No, I have not.

17 Q. An arbitration?

18 A. No.

19 Q. Any type of hearing?

20 A. No. A hearing? I have gone to jury duty. Is  
21 that what you're talking about? No? Okay, no.

22 Q. Have you ever declared bankruptcy?

23 A. No.

24 Q. Have you ever made a claim for unemployment



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1 benefits or insurance?

2 A. No.

3 Q. Have you ever made a claim for workers'  
4 compensation benefits?

5 A. No.

6 Q. Have you ever been interviewed by an attorney  
7 in connection with any other matter than this lawsuit?

8 A. No.

9 Q. Do you have any relatives who work for CSC?

10 A. No.

11 Q. Or have worked for CSC?

12 A. No.

13 Q. Did you go to college?

14 A. Yes, I did.

15 Q. Where did you go?

16 A. Goldey-Beacom.

17 Q. When did you graduate?

18 A. I guess '79, '78.

19 Q. What was your degree in?

20 A. Secretarial studies.

21 Q. Did you go to graduate school?

22 A. No, I did not.

23 Q. Have you had any other education, training, or  
24 courses?



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1 A. Actually I'm going to school to be a nurse  
2 right now.

3 Q. Where are you going to school?

4 A. DelTech.

5 Q. When did you start that?

6 A. I would say -- I want to say September of last  
7 year. September '05. Yes, September of '05.

8 Q. Are you going to night school?

9 A. No. Yes, I am going to night school. It would  
10 be September '04. Sorry. It will be two years.

11 Q. When do you expect to graduate?

12 A. Actually I'm just taking one course at a time  
13 since I am working.

14 Q. Have you ever received any professional or  
15 work-related certification?

16 A. Certifications? Yes. SIX Sigma, Green Belt  
17 and champion training.

18 Q. What are those?

19 A. What are SIX Sigma? Basically it's looking at  
20 quality opportunities to save my money, costs. So you  
21 get a project and you're assigned a project and you look  
22 for different ways -- like this year we had to reduce  
23 Sev 1's, and the idea was to look at your clients who had  
24 a -- the five highest clients and see if there was a



1 common thread and basically they had old hardware and  
2 software that calls these Sev 1's. So that was my  
3 project this year.

4 Q. You're saying Sev 1?

5 A. Severity 1 tickets. They're the highest  
6 tickets in our space.

7 Q. What does that mean?

8 A. Basically a Sev 1 is an outage time, their Web  
9 site would be going down for whatever reason, and the  
10 goal of the project was to find ways or ideas how to  
11 reduce those Sev 1's. Sev 1's cost a lot of money.  
12 People have to be expended, there's outages, there's a  
13 pager, service restoration needs to be involved.

14 Q. You said your other certification was champion  
15 training?

16 A. Champion was only like identifying projects  
17 that should be studied. SIX Sigma Green Belt would be  
18 actually the person doing the work. It's not as good as  
19 a Black Belt. Just certification.

20 Q. Is it received through CSC?

21 A. Yes, it was.

22 Q. Have you ever received any awards or honors?

23 A. In-house in regards to like kudos or special  
24 awards. Nominal money. \$100 or gift check. Things like



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1 that. In CSC and DuPont.

2 Q. What were these awards for?

3 A. Go over and beyond, recognition, team building,  
4 things like that.

5 Q. How many would you estimate you have received,  
6 or if you know for sure, then how many?

7 A. I would say I received about four or five. I  
8 have also gotten them with DuPont. But you're talking  
9 about CSC. If you transitioned from DuPont to CSC, they  
10 would give you an award to make sure things went  
11 smoothly. I'd say I had four or five since '97.

12 Q. These were all nominal amounts of money?

13 A. Yes. American Express gift checks, maybe a  
14 dinner, night on the town. Something like that.

15 Q. Do you have any memberships in professional  
16 associations?

17 A. No, I do not.

18 Q. Where did you work immediately prior to working  
19 for CSC?

20 A. DuPont. And we went to the transition in June  
21 of '97.

22 Q. So your employment at DuPont ended in June of  
23 '97?

24 A. Yes. I think it was May and then we started in



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1 June with CSC. I think that's how it works.

2 Q. It ended because you transferred to CSC?

3 A. That's correct.

4 Q. What was your position at DuPont?

5 A. I was a team leader for the deployment. We  
6 deployed computers and software and hardware for the  
7 company. That's with DuPont you asked, right?

8 Q. Yes. What was your final salary?

9 A. I don't know.

10 Q. Approximately.

11 A. I don't know. Way too in the past.

12 Q. Were you in a bonus program at DuPont?

13 A. No, I was not.

14 Q. Do you know of a bonus program at DuPont?

15 A. Was I aware of one at the time? I can't  
16 remember anything like that.

17 Q. What was your first position at CSC?

18 A. Supervisor of problem resolution for the  
19 desktop techs. So I had a group of men and women  
20 reporting to me to support the DuPont account.

21 Q. So you were a part of the DuPont account?

22 A. Yes, I was.

23 Q. How did the DuPont account fit into the  
24 structure of CSC?



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1           A.       Actually the IT organization of DuPont went two  
2 ways. It went either to Accenture or to CSC. I happened  
3 to be in the infrastructure part and so we went to CSC.  
4 So we were responsible for their servers, their desktops,  
5 some of their applications, mainframes, whatever, in that  
6 perspective.

7           Q.       You're saying some of the people you worked  
8 with at DuPont went to --

9           A.       Accenture.

10          Q.       And your group went to CSC?

11          A.       That's correct.

12          Q.       In June of '97?

13          A.       That's correct.

14          Q.       Were you part of a group called the Chemical  
15 Group?

16          A.       Yes, I was.

17          Q.       Was that when you first started or --

18          A.       No. That was when I first started.

19          Q.       The DuPont account was within Chemical Group?

20          A.       Yes.

21          Q.       Who was your supervisor when you first started?

22          A.       Marion Bowman, B-o-w-m-a-n.

23          Q.       Do you remember who supervised Ms. Bowman?

24          A.       I believe she reported to -- his last name was



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1 Lewis. I forget what his first name was. Lewis,  
2 L-e-w-i-s.

3 Q. Do you know who was the head of the DuPont  
4 account at the time?

5 A. I want to say it was Russ Owens.

6 Q. Do you know who was the head of the Chemical  
7 Group?

8 A. Go back. Head of the DuPont account, I think  
9 it was -- well, Russ Owens was a head of the chemical  
10 account. I don't know who the head of the DuPont account  
11 would have been. No, I don't.

12 Q. What was your starting salary at CSC?

13 A. I don't know.

14 Q. Do you know what your level was when you began  
15 at CSC?

16 A. I'm thinking it was either a 3 or 4. I  
17 believe -- one of the two. I don't know.

18 Q. Did you receive any bonuses while you were in  
19 your first position?

20 A. No, I did not.

21 Q. Did you ever switch positions or get promoted?

22 A. Yes, I did. I was in that position until  
23 about, approximate, 1999, where I went to a service  
24 delivery manager position, SDM, and that would have been



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1 in '99 or 2000, something like that.

2 Q. Did you switch positions after that?

3 A. No. Well, I have been -- I have always been a  
4 service delivery manager, but I got off the DuPont  
5 account. It would have been September -- it was a year  
6 in September '05. So September '04 I went to Web  
7 hosting.

8 Q. So September of '04 you switched out of the  
9 DuPont account --

10 A. Right.

11 Q. -- and switched to a new group?

12 A. Yes.

13 Q. What was the name of it?

14 A. Managed Hosting Services. It had a different  
15 acronym. It was Managed Services Hosting. It's Managed  
16 Hosting Services now. It had a different acronym,  
17 abbreviation before.

18 Q. Did your duties change in that position?

19 A. No. I'm still service delivery manager, but my  
20 clients are different. Carrier Corporation. It's not  
21 the DuPont account anymore.

22 Q. What does the service delivery manager do?

23 A. We ensure end-to-end service for the lines of  
24 service. For example, you have your UNIX and Intel and



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1 your applications and middleware. The clients sign up  
2 for that. So you have weekly meetings and you go over  
3 tickets and you just ensure that you're delivering the  
4 service to your client.

5 I'm an escalation point for the client and  
6 I'm also a focal point to go up the chain of command to  
7 make sure things are done and we're meeting our SLAs.  
8 Service level agreements. Sorry.

9 Q. So you were an SDM at the time that you were  
10 notified that you were not eligible for AMIP; is that  
11 correct?

12 A. That's correct.

13 Q. Who was your supervisor at that time?

14 A. We were reporting -- the SDMs were reporting to  
15 Jeannie Maul, M-a-u-l. We might have had another -- a  
16 director that we worked closely with, and I don't know if  
17 it was Dom DiRamio Jeannie Maul would have been the VP  
18 at that time.

19 Q. You were still part of the DuPont account at  
20 that time?

21 A. That's correct.

22 Q. You received a letter when you transferred from  
23 DuPont to CSC, correct?

24 A. Yes.



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1 Q. Who is your supervisor now?

2 A. Supervisor would be Charlie Campagna in Managed  
3 Hosting Services.

4 (Deposition Exhibit No. 24 was marked for  
5 identification.)

6 BY MS. BOYD:

7 Q. I'm handing you what's been marked as  
8 Exhibit 24. Do you recognize this document?

9 A. Yes.

10 Q. What is it?

11 A. Offer of employment to Computer Sciences  
12 Corporation.

13 Q. You were not made eligible to participate in  
14 CSC's Management Incentive Program when you transferred  
15 to CSC at this time.

16 A. That's correct.

17 Q. When did you first become eligible to  
18 participate?

19 A. When I became the SDM in either '99 or 2000. I  
20 accepted the position from the supervisory position to an  
21 SDM, and that organization was under -- what was his  
22 name? Mark -- I forget. But it was at that time.

23 Q. Do you have any documentation of when you  
24 became part of the program?



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1 A. No. It was a verbal discussion in the  
2 conference room or the office.

3 Q. Who was the discussion with?

4 A. It was with Mark, and I forget his last name.  
5 Sorry.

6 Q. That's okay. Was anyone else present at the  
7 meeting?

8 A. No.

9 Q. That made you eligible for the Annual  
10 Management Incentive Program?

11 A. That's correct.

12 Q. I'll refer to that as AMIP.

13 For what year did that make you eligible?

14 A. Well, I believe my promotion was in the  
15 February time frame. February or March. So obviously I  
16 was not eligible for that year. So it would have to be  
17 the following year. So if it was February -- it would be  
18 '99 would be 2000. 2000 would be '01, right? We were  
19 always one above.

20 Q. So you became eligible at the beginning --

21 A. April of '99 I guess I would be eligible.

22 Q. April 1st, '99?

23 A. Right.

24 Q. The beginning of the fiscal year 1999?



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1 A. Right.

2 Q. April 1st, 1999, which was the beginning of the  
3 fiscal year 2000?

4 A. Right.

5 Q. When did you say you were notified of your  
6 promotion?

7 A. I think the year was '99 when I got the  
8 promotion, and so that would have been -- because I  
9 remember getting two AMIPs. So I want to say February of  
10 '99, that's when I was offered the promotion, the new  
11 job.

12 Q. You said you received two AMIPs. Can you  
13 explain that?

14 A. Two AMIPs. One I guess in '00 and '01 or '01  
15 and '02.

16 Q. I see. So you received an AMIP for fiscal year  
17 2000?

18 A. Right.

19 Q. An AMIP for fiscal year 2001?

20 A. Right. I guess it has to be the opposite --  
21 I'm a little confused here. '04 is the one we're talking  
22 about, right? That's the question. So it would have  
23 been '03 and '02 I got the AMIPs.

24 Q. So you were eligible for AMIP in fiscal year



1 2002, fiscal year 2003?

2 A. Right.

3 Q. You were promoted sometime in fiscal year 2001,  
4 then, you believe?

5 A. Right.

6 Q. Before you transferred from DuPont to CSC, did  
7 DuPont hold any meetings about the transfer?

8 A. Yes.

9 Q. When were those meetings?

10 A. On a very regular basis. There was transition  
11 meetings and as a team leader, I needed to go to  
12 management meetings in regards to roles and  
13 responsibilities for tests and things like that. But I  
14 don't have a recollection of how frequent or when they  
15 were.

16 Q. Was the purpose of these meetings for you to  
17 transition your work?

18 A. Probably transition the work, get to know CSC,  
19 how to complete the forms, their benefits, things like  
20 that.

21 Q. What was discussed about benefits at these  
22 meetings?

23 A. I can't recall. Basically I guess medical and  
24 health, dental, credit union, things like that.



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B-0390

1 Q. Were salaries discussed?

2 A. Not in an open forum, no.

3 Q. Were bonus programs discussed?

4 A. Not in an open forum. Not in the meetings.

5 Q. Were salaries discussed in a private forum?

6 A. I don't recall when they were discussed. I  
7 mean, basically you would meet with your supervisor.  
8 Obviously we had salary discussions for performance in  
9 DuPont, and I guess if you had the opportunity to talk to  
10 your supervisor, you talked about salary there.

11 Q. You spoke to your supervisor at DuPont?

12 A. Right. Transitioning over, what that would  
13 mean.

14 Q. Did anything about bonus programs come up in  
15 those meetings?

16 A. No, it did not.

17 Q. Did you receive any documents at these  
18 meetings?

19 A. Handouts about whatever was routine for CSC  
20 transition we received. I received. That's about it.

21 Q. Do you still have any documents from those  
22 meetings?

23 A. If they are, they're home and I don't know  
24 where they're at. I don't have them at work. From '97,



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1 probably not.

2 Q. What type of documents do you think they would  
3 be?

4 A. Well, if we were getting new healthcare, I  
5 think the urgency was you were moving from one company to  
6 the next. I think more people were concerned about  
7 healthcare and day-care and those kind of things. So I  
8 remember getting information and how to complete the  
9 form. I do remember a meeting how to complete  
10 beneficiary forms, life insurance and things like that.

11 Q. Have you told me everything you recollect from  
12 these meetings that involved the transition from DuPont  
13 to CSC?

14 MR. WILSON: Object to form.

15 A. Yes.

16 MR. WILSON: You can answer.

17 THE WITNESS: Yes. That I can remember.

18 Q. Did you participate in any orientation when you  
19 first began working with CSC?

20 A. Yeah. I remember meetings.

21 Q. Was that when you first started?

22 A. Yes.

23 Q. It would have been June of '97?

24 A. Right.



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B-0392

1 Q. Do you remember who conducted the orientation  
2 meetings?

3 A. No, I do not.

4 Q. Was it one meeting or several meetings?

5 A. When we moved over from DuPont to CSC, I guess  
6 the initial question was how are we going to fit into the  
7 new role, reporting order, the structure, where we're  
8 going to locate. The big thing was where are we going to  
9 sit. We're on DuPont property. Do we have to find our  
10 own buildings. Things like that. More like housekeeping  
11 and day-to-day operational stuff since I had an  
12 operations team where people were concerned. Some people  
13 had to sit in Wilmington, Barley Mill, other places. Sit  
14 with the client. Things like that.

15 Q. Were benefits discussed at any of these  
16 meetings?

17 A. What I remember is more operational  
18 discussions.

19 Q. So benefits were not discussed?

20 A. No.

21 Q. Were bonuses ever discussed?

22 A. Not that I recall.

23 Q. Have you told me everything you remember about  
24 the orientation discussions when you first came to CSC?



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1 MR. WILSON: Object to the form.

2 A. Yes.

3 Q. What does AMIP stand for?

4 A. Annual Management Incentive Program.

5 Q. What is it?

6 A. Well, it was described to me when I was  
7 eligible that it was a way for myself -- I was part of  
8 the account team and our goal was to -- the goal was to  
9 incentify me to find revenue opportunities or to reduce  
10 costs for the DuPont account.

11 Q. How did you know what AMIP was?

12 A. Well, I asked questions and basically I was  
13 asked how do I deliver or what's the expectation of me to  
14 incentivize. If I could get additional money, I wanted  
15 to know how I could do that.

16 Q. Who did you ask questions to?

17 A. Mark Kasab, K-a-s-a-b.

18 Q. He was your supervisor at the time?

19 A. Well, actually he was more of a VP, but we --  
20 service delivery reported under him, yes.

21 Q. You spoke to him about the AMIP program?

22 A. That's correct.

23 Q. That was prior to you becoming eligible for the  
24 AMIP program?



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1 A. No. He talked to me when I was eligible.

2 Q. Did you know about the program before then?

3 A. Yes, I did.

4 Q. How did you know about it?

5 A. Well, because I knew it was part of the  
6 account -- the account team worked for it and basically  
7 when I was applying for the job, I interviewed and I  
8 asked about it and they said what the program was about.  
9 So I knew that it existed.

10 Q. When you were applying for which job?

11 A. Service delivery job.

12 Q. I'm sorry. What was your job before then?

13 A. I was a supervisor of the techs, desktop techs.

14 Q. You interviewed with Mark Kasab to receive that  
15 job?

16 A. I don't remember who I interviewed with. I  
17 remember interviewing with the account manager that I  
18 would be working with, Jim Walla.

19 Q. In your interviews you inquired about how the  
20 AMIP program worked?

21 A. That's correct.

22 Q. And whether you would be eligible for AMIP?

23 A. That's correct.

24 Q. Were you shown any documents about AMIP?



1 A. No, I did not. I didn't see any.

2 Q. Is there a plan that controls how CSC  
3 implements AMIP?

4 A. I'm sure there is, but the problem was it was  
5 held very close to the chest. I won't say loosey-goosey,  
6 but you were told you were on it and basically unless you  
7 were told you were off it, you worked. You had a goal, a  
8 personal goal or objective, and you worked your project  
9 and whatever you had at the beginning of the fiscal year.

10 Q. So you believe there was a plan but that you  
11 have never seen it?

12 A. That's correct.

13 Q. You understood AMIP through word of mouth?

14 A. Well, no. Actually the example that I have --  
15 the last AMIP that I worked on, since I was a service  
16 delivery manager, every January you would meet in a  
17 conference room early in the year and you would discuss  
18 ways to improve the organization, and so you had that  
19 meeting in January. We discussed how we would break up  
20 in teams, you would have a leader and a coleader, and  
21 basically you would go off in January and February, come  
22 up with a charter, and then you would have that charter  
23 blessed and you would kick off before April 1.

24 Because when April 1 started, you had your



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1 team in place and you had some of the deliverables and  
2 you were going to be asked every month, if not weekly,  
3 your progress on your personal objective or your project  
4 for your AMIP. That's what I did.

5 Q. Who attended the meetings in January?

6 A. Everybody under Jeannie Maul. We had to have a  
7 brainstorming session of what we wanted to do for the  
8 upcoming year.

9 Q. So at these meetings you brainstormed to come  
10 up with objectives for the following fiscal year?

11 A. That's correct.

12 (Deposition Exhibit No. 25 was marked for  
13 identification.)

14 BY MS. BOYD:

15 Q. I'm handing you what's been marked Exhibit 25.  
16 Do you recognize this document?

17 A. Yes, I do.

18 Q. What is it?

19 A. Actually it's the objectives -- we had an  
20 initial list developed on January 8th, and basically  
21 No. 10 would have been my objective and my personal AMIP  
22 item, and it was to develop and document business plans.

23 Q. Who are all the other people on this list?

24 A. Actually these are folks that were in



1 Jeannie Maul's organization.

2 Q. Was this a list of objectives that you were  
3 talking about that was compiled in the January meeting?

4 A. That's correct.

5 Q. So are you saying this is a list that was  
6 compiled as a result of brainstorming at that meeting?

7 A. That's correct.

8 Q. You were given this one objective No. 10?

9 A. That's correct.

10 Q. What is the writing beneath your objectives,  
11 beneath line No. 10?

12 A. I believe looking back at this we wanted to --  
13 SDMs wanted to get the voice of the customer. We wanted  
14 to do documented strategy around new business and expand  
15 scope. So basically a lot of times we work day-to-day  
16 and we weren't proactive or we didn't know what was  
17 coming down the pike.

18 So what we wanted to do here is work with  
19 our businesses and see if we could come up with a list of  
20 new opportunities that were coming our way. So we would  
21 have a bench, we would have project managers available to  
22 do things.

23 We also wanted to look at the voice of the  
24 customer. We got rated annually, if not -- there was I



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1 want to say a customer service report, and basically we  
2 wanted -- APARS I don't know what it stood for, but  
3 obviously they were color-coded. If they were red,  
4 obviously you were in trouble. So we wanted to find out  
5 what those red items were and fix them. Overall we  
6 wanted a good report back from the client.

7 Q. Can you describe to me generally what APARS  
8 are?

9 A. Actually it was the account -- GPARS and APARS.  
10 They were more like the businesses would get an e-mail or  
11 a checklist and they would rank us for different things,  
12 customer service or accuracy and things like that, and  
13 the goal was to get I don't want to say 100 percent, but  
14 as close to perfect. In a lot of cases we were red  
15 and -- we wanted to get -- the SDMs wanted to work closer  
16 with the account team to see if we can improve that.

17 Q. Are these your handwritten notes?

18 A. Yes, they're my handwritten notes. So  
19 basically this is the information here on the second page  
20 what we wanted to do. I'm just seeing if we had anything  
21 on here that would help me with the definitions.

22 Q. Was this document created in March of 2004?

23 A. Yes.

24 Q. This is listing your accomplishments?



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1 A. That's correct.

2 Q. For fiscal year 2004?

3 A. That's correct.

4 Q. Did you create this document?

5 A. Yes, I did. I was the team lead. So basically  
6 my goal was to present the information not only to staff  
7 but to make sure it was accurate within the group.

8 Q. Were the people in the team all listed on this  
9 first page?

10 A. Actually 1 to 10, I would be the lead and my  
11 backup was Linda Boone. So these were other objectives.  
12 So the column "Lead" was the team leader.

13 Q. Were all the people on this list eligible for  
14 AMIP?

15 A. Yes.

16 Q. Turning to the fourth page, it looks like a  
17 spreadsheet. What is this document?

18 A. All right. So we had our meeting with -- in  
19 January, and basically the idea was to have -- the idea  
20 was that we weren't just kicking it off and meeting for  
21 the first time April 1. So Linda and I worked on this  
22 prior to April 1. So these were some of the high-level  
23 tasks or things that we wanted to produce during the  
24 year. And, of course, the last column didn't come out.



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B-0400

1 Whether it was broken down or the owners would be on the  
2 next page.

3 Q. Did the "Start" and "Finish" column show when  
4 each task began and was completed?

5 A. Yes. That's what we wanted to do because we  
6 were reporting back to Jeannie in our staff meeting at  
7 least once a month, if not sooner, or if we had a meeting  
8 set up with the account managers or business, we wanted  
9 to make sure that we had something in writing we were all  
10 looking at the same document. So the start date and the  
11 finish date is pretty accurate.

12 Q. Were the start date and finish dates actual  
13 dates or were they dates that you hoped to achieve?

14 A. No. They're pretty -- they were actual.

15 Q. When you created this document, you already  
16 knew when things had started and finished?

17 A. Yes. We started before April 1. I started  
18 before April 1.

19 Q. Or April 1 of 2003?

20 A. Yes.

21 Q. Some of these tasks weren't completed until  
22 March of 2004; is that correct?

23 A. Actually -- that's correct.

24 Q. So this document was created after March of



1 2004?

2 A. No. This was created -- this document was  
3 created in January or February of '03.

4 Q. So the dates were prospective dates that you  
5 hoped to achieve?

6 A. You mean for the finish date?

7 Q. Exactly.

8 A. Yes. But the "Work Complete" column indicates  
9 where we were at that point.

10 Q. At the point in January '03?

11 A. Well, I don't have a date on here, but that was  
12 the last update that I had printed out. So I can't  
13 indicate what date this was.

14 Q. The goals on here and the goals on the first  
15 page remained the team's goals throughout the entire  
16 fiscal year '04?

17 A. Actually, I remember -- I know there's a  
18 document here of December 2nd, '03. We have a proposed  
19 agenda. And I don't have any records, but it's either at  
20 the end of September -- sometime in October or September  
21 we gathered as a team and took a vote whether we should  
22 move forward. I want to say it was in the October time  
23 frame. But I don't have any data to prove that.

24 Q. Are you looking at page 3 of this exhibit?



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B-0402

1 A. Yes, I am. Proposed agenda.

2 Q. This was the agenda for a meeting that was held  
3 in October of 2003?

4 A. No. This is the agenda for a meeting that was  
5 held on September 4th at 1:30.

6 Q. I'm sorry. Could you tell me again what the  
7 purpose of this meeting was?

8 A. To follow through on our project plan. This  
9 was the subject. We were going to look at whether we  
10 were going to do pioneer training and update around that.  
11 We broke up the items on the project plan by different  
12 folks. So if somebody had the pioneer training, somebody  
13 had to report back on that, our metrics, GPARS. There it  
14 is again. I'll be darned if I remember what it was. We  
15 want to improve our ratings and try to get more kudos  
16 from the clients and produce that.

17 So each person had a responsibility to  
18 report back on that.

19 Q. So you were checking in on the objectives that  
20 had earlier been assigned?

21 A. Actually one of -- if you look, I think I had  
22 scheduled meetings -- one there was to schedule meetings  
23 for the rest of the year. I did that. So meetings were  
24 already established between April 1 through April -- oh,



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1 that was how many days it would take me to do it. One of  
2 my goals was to schedule biweekly meetings for the fiscal  
3 year on this project.

4 Q. Now you're looking at page 4?

5 A. I'm looking at the first page of the project  
6 planning. If you look at schedule biweekly meetings, one  
7 of the milestones that I had to do was schedule meetings  
8 and I did that. That's why it's 100 percent.

9 Q. So this was one of those meetings?

10 A. That's correct.

11 Q. This September 4th, 2003, meeting was one of  
12 the biweekly meetings?

13 A. That's correct.

14 Q. These meetings were to check in on the progress  
15 of the objectives for the team?

16 A. Yes.

17 Q. Did the team continue to progress to achieve  
18 these objectives throughout the fiscal year?

19 A. Yes. This is my charter. This is the charter.

20 Q. What is your charter?

21 A. This was after we had our meeting in January,  
22 this is the document that we came up with that we  
23 represented -- or we presented to Jeannie Maul's staff.  
24 She had a core team. What we were going to do, our





1 objectives, our scope, our deliverables, when we were  
2 going to kick it off, initial kickoff meeting with the  
3 rest of the team. So page -- this and this is the  
4 document.

5 Q. You're looking at Miller 397?

6 A. That's correct. And 398.

7 Q. This was created after the January meeting?

8 A. Yes, it was.

9 Q. Specifically for you?

10 A. Actually it was probably created in the  
11 February time frame because we had to have it blessed  
12 before March.

13 Q. Who blessed it?

14 A. It was a core team. Let's see. I don't  
15 remember who was in the room. Obviously Jeannie couldn't  
16 be at every meeting, so she had maybe the directors or  
17 the senior managers in the room to decide. Obviously all  
18 10 objectives -- you work on things that gave you more  
19 bang for the buck. So ours was blessed to proceed. That  
20 was the charter to proceed.

21 Q. So Jeannie Maul or somebody who worked for her  
22 gave you the go-ahead on this charter?

23 A. Yes.

24 Q. And that was before March of 2003?



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1 A. Yes.

2 Q. The company distributed its policies on  
3 compensation by e-mail and the Internet, right?

4 A. Policies? What do you mean by "policies"?

5 Q. Did you receive any documents that described  
6 compensation from the company?

7 A. If I had received compensation -- usually that  
8 was a discussion that was in a room with your supervisor.  
9 They will say you will be having a meeting with your  
10 supervisor. But actually, if there's anything about  
11 compensation or things of that nature, it was probably  
12 brought up at the staff meeting that this is coming.

13 Q. What type of issues would be discussed at the  
14 staff meeting?

15 A. The staff meeting? Finance. Every week we  
16 would know how the account was doing, things that we were  
17 having problems with. We tried to throw some good things  
18 in there, too, things -- projects that were working very  
19 well.

20 Q. Would salaries be discussed?

21 A. No.

22 Q. Bonuses?

23 A. No.

24 Q. Did you ever receive any type of e-mails or



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1 documents that spoke about various different types of  
2 compensation that were available to you?

3 A. No. I don't remember that.

4 Q. Do you know of anything that was available on  
5 the Internet of that nature?

6 A. No.

7 Q. Have you ever seen any policies related to  
8 AMIP?

9 A. Not that I can remember, no.

10 Q. Do you have any e-mails or letters or other  
11 types of documentation that shows you're eligible --

12 A. No, I don't. I don't have anything.

13 Q. You don't have any documentation that shows  
14 you're eligible for AMIP ever?

15 A. Ever? The only thing I got was a receipt that  
16 I got one and in some cases -- I only remember getting  
17 one from Jeannie Maul. After the fact. After the fiscal  
18 year. And I was about to get the money and the paycheck.  
19 I never received anything prior to that.

20 Q. When you say "a receipt," what do you mean?

21 A. Well, the form that shows the bonus for the  
22 year. It was broken down in percentages, what was for  
23 maybe customer service or earnings per share.

24 Q. An AMIP worksheet, is that what you mean?



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1 A. Yes.

2 Q. It was an Excel spreadsheet?

3 A. No. I think there was something -- an example.  
4 It was in a folder.

5 (Deposition Exhibit No. 26 was marked for  
6 identification.)

7 BY MS. BOYD:

8 Q. I'm handing you what's been marked as  
9 Exhibit 26.

10 A. Yes.

11 Q. That was the receipt you received from  
12 Jeannie Maul?

13 A. Yes.

14 Q. You received that after the fiscal year had  
15 closed?

16 A. Yes. I believe that's when we got it. Yes.  
17 They wouldn't do it prior to that.

18 Q. Why did you receive it after the close of the  
19 fiscal year?

20 A. I'm sure it's a legal item that the books have  
21 to be closed. However -- that's the only way I can think  
22 of it. It's got to be a financial decision, corporate  
23 decision.

24 Q. An AMIP bonus is essentially a percentage of



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1 your salary, correct?

2 A. Yes.

3 Q. And that percentage is based on a number of  
4 factors?

5 A. Yes.

6 Q. Which these factors could include corporate  
7 objectives; is that right?

8 A. That's correct.

9 Q. And group objectives?

10 A. That's correct.

11 Q. Personal objectives?

12 A. Right. That's correct.

13 Q. So they could be financial or nonfinancial  
14 factors?

15 A. That's correct.

16 Q. And the factors can change from year to year?

17 A. I would say they were pretty constant. The two  
18 that I had, it was basically the financial objectives and  
19 the measures were the same. What changed was the  
20 personal item that -- I'm going to reference this  
21 document.

22 Q. You're referencing Exhibit 25?

23 A. 25. That would change, what you were going to  
24 work on that year.



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1 Q. Your personal objectives would change from year  
2 to year?

3 A. That's right.

4 Q. Did the targets for the company for the  
5 corporate objectives change from year to year?

6 A. Earnings per share I know would change.

7 Q. Would revenue goals change from year to year?

8 A. Revenue would want to be going up. So I guess  
9 that's a yes.

10 Q. Would cost budgets change from year to year?

11 A. Yes.

12 Q. And operating income margin changed from year  
13 to year?

14 A. Yes.

15 Q. So these factors are based on CSC's financial  
16 performance during the fiscal year, correct?

17 A. Yes.

18 Q. I think we have already stated this, but the  
19 fiscal year runs from April 1st through March 31st?

20 A. Yes.

21 Q. How is the AMIP bonus actually calculated?

22 A. Well, I know that there was a weighted average  
23 and basically would take that average and they would add  
24 up to 100 percent, but -- and then based on your salary.



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1 I was always -- it was 10 percent that I was eligible  
2 for, maximum bonus potential.

3 Q. Did those weightings change from year to year?

4 A. I don't know.

5 Q. Did the team objectives change from year to  
6 year?

7 A. Customer satisfaction was always there, and,  
8 again, the individual would change.

9 Q. Would the targets for the team goals change?

10 A. The target -- you mean the obtain 95 percent?

11 Q. If the goal was customer satisfaction, would it  
12 change in terms of what the target was for achieving  
13 customer satisfaction?

14 A. No, I would say those two were consistent in  
15 regards to 95 percent and then -- and the weight was  
16 divided up between the individual and the team. So that  
17 stayed constant.

18 Q. So the 95 percent was the same every year you  
19 believe?

20 A. I believe it was.

21 Q. You received an AMIP worksheet for two years?

22 A. That's correct.

23 MS. BOYD: We would like to take a short  
24 break.



1 (A recess was taken.)

2 BY MS. BOYD:

3 Q. I wanted to go back to Exhibit 26 for just a  
4 minute. When did you receive information about the  
5 corporate financial objectives?

6 A. Each week -- well, we reviewed finance at the  
7 financial part of the DuPont account on a weekly basis at  
8 Jeannie's staff. Now, we didn't review AMIP or anything  
9 like that. So we actually knew what the account was  
10 doing on a weekly basis.

11 So are you looking for like something that  
12 I received in regards to the account or in regards to  
13 AMIP?

14 Q. Were you ever given information about what  
15 these corporate goals were for the fiscal year?

16 A. It was probably announced at staff what the  
17 goals were. It came from corporate and filtered down at  
18 the weekly meetings.

19 Q. When would that have been announced?

20 A. I'm sure that the kick-off meeting beginning of  
21 the fiscal year what the goals were and basically at  
22 least monthly meetings where we stood around the account.  
23 So we always had an idea of where we were on a monthly  
24 basis, if not biweekly. So that's how we got information



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1 around the account.

2 Q. These overall financial targets for the fiscal  
3 year, those couldn't have been told to you in January  
4 before the fiscal year, could they, for the new fiscal  
5 year?

6 A. No, I really don't know. I can't answer that  
7 what happened or what was announced. I guess we were  
8 always working on the current year, but basically we were  
9 told -- are you trying to imply that I'd be working on  
10 something not knowing what my objective was for the  
11 finance?

12 Q. I'm just trying to find out when you learned of  
13 what these corporate goals were, these corporate targets  
14 and goals.

15 A. Not sure how to answer that.

16 Q. So you don't know?

17 A. I don't know. I don't know when we were told.

18 Q. But you were told at some point?

19 A. Yes.

20 Q. You don't have any idea of the time frame for  
21 when you would have been told?

22 A. No. Bob Hyland was our financial  
23 representative on Jeannie's account for the SDM. He had  
24 at least a monthly presentation of where we were for the



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1 previous year and where we would be going for the next  
2 year. So unless we went back to every meeting and the  
3 agenda, I can't say.

4 Q. You said his name was Mr. Hyland?

5 A. Bob Hyland.

6 Q. His monthly presentation, was that about where  
7 your team was going?

8 A. Yes. It represents Jeannie Maul's organization  
9 and Jeannie would share anything that she heard in  
10 regards to corporate.

11 Q. What was Jeannie Maul's organization?

12 A. It would be service delivery.

13 Q. Which was part of GIS?

14 A. That's correct.

15 Q. Do these monthly meetings report on financials  
16 for the entire company as a whole?

17 A. Basically she would bring any information that  
18 she could share with her team in regards to the finance  
19 and corporate.

20 Q. Do you remember if you were told of the  
21 corporate objectives for fiscal year 2004?

22 A. Actually Russ Owens or whoever was leading  
23 would have objectives. I know they would meet down in  
24 Falls Church and that would deliver -- we would have to



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1 take their objectives and break it down into objectives  
2 for our team.

3 So if it was at this level, you can't see  
4 my hand, but if it was at a higher level, we would take  
5 those same objectives and see if we could break it down  
6 to meet or produce a deliverable in our organization. So  
7 I do know that we did hear information from corporate.

8 Q. Was it this type of information, these types of  
9 targets and goals?

10 A. Yes.

11 Q. So you do remember getting this information  
12 that described budget, achievements, weightings?

13 A. Some of the information maybe came by e-mail  
14 overall what we were going to do for the next fiscal  
15 year. Some of the information was probably drilled down  
16 in the meeting. I can't respond in regards to accurate  
17 numbers or percentages, but I do know that we did get  
18 information.

19 Q. So you at least got general information?

20 A. That's correct.

21 Q. But you're not sure that you got this specific  
22 information?

23 A. I'm not sure.

24 Q. Is that for fiscal year 2004 that we're



1 speaking of?

2 A. Well, actually we received this kind of  
3 information -- as long as I was a service delivery  
4 manager, I knew it was on the agenda to receive what was  
5 going on in corporate and how we could incorporate it.  
6 Whenever I took that position as an SDM and I attended  
7 weekly meetings, if it wasn't on a monthly basis, it was  
8 on a biweekly basis that we got information. And as the  
9 year progressed, the first six months we always had to  
10 see where we were for the target. So...

11 Q. Getting back to the actual objectives on this  
12 sheet, you believe you received an AMIP payment for  
13 fiscal year '03 and fiscal year '02; is that correct?

14 A. Yeah. So this is '03 that I received -- yeah,  
15 '03 and '02.

16 Q. So you only have seen these sheets for fiscal  
17 year '03 and fiscal year '02; is that correct?

18 A. Actually, I don't remember getting one from  
19 Mark Kasab when Chris Helme took his job. So I don't  
20 remember getting one from either one of them. I do  
21 remember Jeannie Maul was handing these out. For  
22 whatever reason, I did not get one from these two  
23 individuals.

24 Q. You only had seen an AMIP worksheet for fiscal

1 year '03?

2 A. Yes.

3 Q. The weightings could have changed from year to  
4 year, then, correct?

5 A. Yes.

6 Q. They could have been different in years that  
7 you didn't see the worksheet, correct?

8 A. That's correct.

9 Q. Or years that you didn't receive an AMIP?

10 A. That's correct.

11 Q. Do you know anyone who's received a prorated  
12 AMIP bonus?

13 A. No, I do not. Actually you really shouldn't  
14 discuss this. So it was something either you had it and  
15 kept it under your belt. So no, I don't.

16 Q. People didn't discuss their AMIP bonuses?

17 A. No.

18 Q. Do you know anyone who was removed from AMIP?

19 A. Besides me? Well, actually, if we had -- it  
20 was the SDMs. So anybody that was working with me at the  
21 time, we were all in the same pot. So yeah, from my  
22 previous job, all those folks would have been removed.

23 Q. Do you know anyone who was removed from AMIP  
24 prior to fiscal year '04?



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1 A. No, I do not.

2 Q. You said that you received e-mails with some  
3 financial information. Do you remember who you would  
4 have received those e-mails from?

5 A. Well, the only e-mails that I would receive are  
6 something from corporate. Very basic. I would never  
7 receive anything personal and confidential via e-mail.

8 Q. Who sent the corporate e-mails?

9 A. Could have been Honeycutt, somebody from Falls  
10 Church. Information that was distributed to everyone  
11 that had anything to do in our goals or objectives or the  
12 state of the -- I won't say state of the union. Anything  
13 like that. I never received anything via e-mail that was  
14 something like AMIP or salary information.

15 Q. Do you remember anything in particular that you  
16 did receive regarding corporate financial information?

17 A. No. Basically, when -- even before I got AMIP  
18 at the end of the year, there would be a -- we made our  
19 goal and the upcoming year's going to be as challenging.  
20 Something like that to that nature. I do remember  
21 e-mails like that. We still get them today.

22 Q. You were notified by CSC that you would no  
23 longer be eligible for participation in the AMIP program  
24 for fiscal year 2004?



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1 A. Uh-huh.

2 Q. When was that?

3 A. There was a meeting invite from Jeannie to her  
4 organization -- and I don't know the specific date. I  
5 believe it was late August or early September -- to  
6 attend a meeting. The subject was not -- there was no  
7 indication what the subject matter was about, but to  
8 attend a meeting and that's when we were told.

9 Q. Who attended the meeting?

10 A. Her direct reports or people that were eligible  
11 for AMIP.

12 Q. Approximately how many people were at the  
13 meeting?

14 A. Well, it was face-to-face or on a conference  
15 call. So I would say there were 15, 20 people.

16 Q. Were you there face-to-face?

17 A. I was there face-to-face.

18 Q. What did Ms. Maul say?

19 A. Basically that we were not eligible for the  
20 AMIP program.

21 Q. Did she say why?

22 A. No. There was not really a clear reason given.

23 Q. Did she tell you that you may be eligible for a  
24 discretionary bonus?



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1 A. Well, actually everybody -- yes, you were told  
2 that, but that's just common knowledge that anybody was  
3 eligible for the discretionary bonus.

4 Q. So you believe you could have received an AMIP  
5 bonus and a discretionary bonus?

6 A. No. What I'm saying is that we were told that  
7 we were no longer on the AMIP and that we were eligible  
8 for the discretionary bonus, but I believe the  
9 discretionary bonus was always out there anyway. It  
10 wasn't like now all of a sudden you're eligible for a  
11 discretionary bonus. It was always available anyway.

12 Q. Do you know of anyone who ever received an AMIP  
13 bonus and a discretionary bonus for the same year?

14 A. No, I don't know.

15 Q. Was the meeting with Jeannie Maul the first  
16 time you learned you wouldn't be eligible for AMIP --

17 A. Yes.

18 Q. -- for fiscal year 2004?

19 A. Yes.

20 Q. You understood from that meeting that you  
21 wouldn't be receiving any AMIP bonus at all for that  
22 year?

23 A. Yes.

24 Q. You're claiming that CSC has improperly



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1 withheld your AMIP bonus for the period of time from the  
2 beginning of that fiscal year through that notification  
3 from Jeannie Maul; is that correct?

4 A. Repeat what you just said.

5 Q. What is the period of time for which you think  
6 you are owed a prorated AMIP?

7 A. Well, I know the fiscal year starts from  
8 April 1 to March 31, but I clearly started before that.  
9 So basically I worked from at least February through  
10 September or October on this objective. I don't know --  
11 so yeah, I believe that I put some effort and so did my  
12 team.

13 Q. You're saying the period is from April 1, 2003,  
14 through the time of notification by Jeannie Maul?

15 A. Yes.

16 Q. Which you believe was late August --

17 A. I don't get any credit for the time I did in  
18 February and March? But yeah, I definitely say that it's  
19 definitely April.

20 Q. Are you contending it should have started in  
21 February?

22 A. Well, let's put it this way: If I wasn't ready  
23 to kick off by April 1 and have all this, my head would  
24 have been in a knot. I would not have been an SDM. They



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1 gave me this assignment to kick it off. So I think I  
2 have a valid point. Jeannie is a tough cookie and I  
3 respect her a lot, but I just couldn't start at April 1st  
4 and have hemming and hawing. I need to show some  
5 progress. You don't finish it March 31st. You finish it  
6 before that.

7 Q. Referring back to Exhibit 25, it does say  
8 fiscal year '04 objectives on that list, correct?

9 A. That's correct.

10 Q. Those were objectives for fiscal year '04?

11 A. That's correct.

12 Q. Even though you're saying they were developed  
13 earlier?

14 A. Obviously we had this list. It wasn't just me.  
15 It was everybody on this list that you had to produce and  
16 have something before the kick-off, April 1.

17 Q. So you're saying that the period does start at  
18 April 1, 2003?

19 A. Yeah.

20 Q. Did you receive a letter informing you of your  
21 removal from fiscal year '04?

22 A. I don't remember that. I just remember the  
23 meeting.

24 Q. You don't remember receiving any letter?



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1 A. No, I don't remember.

2 Q. After that meeting with Jeannie Maul, did your  
3 objectives change for fiscal year '04?

4 A. No. Some of these items remained on the list.

5 Q. You continued to have the same goals?

6 A. Yes.

7 Q. You continued to work towards those objectives?

8 A. Yes.

9 Q. These objectives, they were part of your job  
10 description, is that correct, referring back to  
11 Exhibit 25?

12 A. No. 10 -- actually this was over and beyond my  
13 day-to-day work. The work that I was doing, managing  
14 this team, being the team -- this was over and beyond  
15 what I was expected to do from day-to-day.

16 Q. These were objectives on top of your job  
17 description; is that what you're saying?

18 A. That's correct.

19 Q. But yet you were expected to fulfill these  
20 objectives?

21 A. That's correct.

22 Q. So in that sense, they became part of your job  
23 description?

24 A. Until the end of the year, yes. Until I



1 delivered them. If I got finished before March 31st,  
2 that's even better.

3 Q. As we said earlier, some of these tasks were  
4 finished at the end of fiscal year '04 and some of them  
5 were finished earlier. Correct?

6 A. That's correct.

7 Q. You received performance appraisals every year;  
8 is that right?

9 A. That's correct.

10 Q. They don't have anything to do with this  
11 lawsuit, do they?

12 A. No.

13 Q. Other than the meeting with Jeannie Maul, were  
14 there any other communications you had of any nature  
15 regarding the change to --

16 A. No.

17 Q. -- regarding the change to fiscal year '04 AMIP  
18 eligibility?

19 A. No.

20 Q. You didn't receive any e-mails?

21 A. No.

22 Q. Did you have any telephone calls, meetings?

23 A. No, I didn't.

24 Q. Did you discuss the change with anyone?



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